

Atty. Dkt. No. 200400723-1

**REMARKS**

This Reply is in response to the Office Action mailed on July 21, 2005.  
Reconsideration and allowance of the claims now pending is requested.

**I. Claim Objection.**

Paragraph 1 of the Office Action objected to 19 because of an alleged informality. Claim 19 has been amended. Applicants submit that the amendment to claim 19 does not alter the scope of claim 19 and is not made for purposes of patentability but rather to improve syntax. Withdrawal of the objection to claim 19 is requested.

**II. Rejection of Claims 1 and 4.**

Paragraph 3 of the Office Action rejected claim 1 and 4 under 35 U.S.C. § 103(a) as being unpatentable over Tanno in view of Wakatsuki. Applicants are amending claim 1 to recite "removing the first media from the print zone before the reversing the polarity of the first and second nodes." Applicants submit that neither Tanno nor Wakatsuki disclose removing the first media from the print zone before the reversing the polarity of the first and second nodes. Consequently, Applicants submit that claim 1 is allowable. Withdrawal of the rejection of claim 1 is requested.

Claim 4 depends upon claim 1 and is allowable for at least the same reasons claim 1 is allowable. Withdrawal of the rejection of claim 1 is requested.

**III. Rejection of claims 7, 9, 11-13, 15, 18-21, 23, and 25**

Paragraph 4 of the Office Action rejected claims 7, 9, 11-13, 15, 18-21, 23, and 25 under 35 U.S.C. § 103(a) as being unpatentable over Nomura in view of Wakatsuki. Claim 7 is amended to recite "a polarity control device configured to energize the first and second conductors with opposite polarity and to reverse the polarity of the first and second conductors according to a detected location of a sheet of print medium." Applicants submit that neither Nomura nor Wakatsuki disclose such a polarity control device. Indeed, Wakatsuki teaches a contrary approach of

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inverting "the polarity of voltage ... every specific length of time" rather than "according to a detected location of a sheet of print medium." As such, Applicants submit that amended claim 7 is patentable over Nomura in view of Wakatsuki. Withdrawal of the rejection of claim 7 is requested.

Claims 9 depends upon claim 7 and is allowable for at least the same reasons claim 7 is allowable. Withdrawal of the rejection of claim 9 is requested.

Claim 11 is amended to recite "circuitry configured to charge the first and second electrodes with opposite polarity and to reverse the polarity of the first and second electrodes based on media location." Applicants submit that Nomura in view of Wakatsuki fails to teach or suggest this feature. In fact, and as noted above, Wakatsuki teaches a contrary approach of inverting "the polarity of voltage ... every specific length of time" rather than "according to a detected location of a sheet of print medium." Hence, Applicants submit that claim 11 is patentable over Nomura in view of Wakatsuki. Withdrawal of the rejection of claim 11 is requested.

Claims 12, 13, 15, and 18 depend upon claim 11 and are allowable for at least the same reasons as claim 11 is allowable. Withdrawal of the rejections of these claims is therefore requested.

Claim 19 is amended to recite "means for energizing first and second nodes of a capacitive mat with opposite polarity and reversing the polarity of the first and second nodes no more than five (5) seconds before loading media on the capacitive mat." Applicants submit that this feature is not disclosed in the cited references. In this regard, Applicants direct the Examiner's attention to the Examiner's statement of reasons for the indication of allowable subject matter for claim 5 (Office Action, page 9). Withdrawal of the rejection of claim 19 is requested.

Claim 20 has been amended to recite language similar to that of claim 19 and is therefore allowable at least for reasons similar to the reasons claim 19 is allowable. Withdrawal of the rejection of claim 20 requested.

Claim 21 is cancelled, thus rendering moot the rejection thereof.

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Claims 23 depends upon claim 20 and is allowable for at least the same reasons claim 20 is allowable. Withdrawal of this rejection is requested.

Claim 25 is cancelled, thus rendering moot the rejection thereof.

IV. Rejection of claims 7, 11, and 17

Paragraph 5 of the Office Action rejected claims 7, 11, and 17 under 35 U.S.C. § 103(a) as being unpatentable over Watanabe in view of Wakatsuki.

Claim 7 is amended to recite "a polarity control device configured to energize the first and second conductors with opposite polarity and to reverse the polarity of the first and second conductors according to a detected location of a sheet of print medium." Applicants submit that neither Watanabe nor Wakatsuki disclose such a polarity control device. Indeed, Wakatsuki teaches a contrary approach of inverting "the polarity of voltage ... every specific length of time" rather than "according to a detected location of a sheet of print medium." As such, Applicants submit that amended claim 7 is patentable over Watanabe in view of Wakatsuki. Withdrawal of the rejection of claim 7 is requested.

Claim 11 is amended to recite "circuitry configured to charge the first and second electrodes with opposite polarity and to reverse the polarity of the first and second electrodes based on media location." Applicants submit that Watanabe in view of Wakatsuki fails to teach or suggest this feature. In fact, and as noted above, Wakatsuki teaches a contrary approach of inverting "the polarity of voltage ... every specific length of time" rather than "according to a detected location of a sheet of print medium." Hence, Applicants submit that claim 11 is patentable over Watanabe in view of Wakatsuki. Withdrawal of the rejection of claim 11 is requested.

Claim 17 depends upon claim 11 and is allowable for at least the same reasons as claim 11. Withdrawal of the rejection of claim 11 is requested.

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**V. Rejection of claim 14**

Paragraph 6 of the Office Action rejected claim 14 under 35 U.S.C. § 103(a) as being unpatentable over Nomura in view of Wakatsuki and further in view of Tanno. Claim 14 depends upon claim 11 and is allowable for at least the same reasons claim 11 is allowable.

**VI. Allowable Subject Matter**

Claim 26 is allowed. Claims 2, 3, 5, 6, 8, 10, 16, 22, and 24 were objected to as being dependent upon a rejected base claim. Claims 2, 3, and 5 depend upon allowable claim 1. Claim 6 has been rewritten in independent form. Claims 8 and 10 depend upon allowable claim 7. Claim 16 depends on allowable claim 11. Claim 22 has been rewritten in independent form. Claim 24 depends indirectly upon allowable claim 20. Accordingly, Applicants submit that the claim objections are overcome and request withdrawal of the claim objections.

**VII. Statement of Reasons**

Paragraph 9 of the Office Action is "a statement of reasons for the indication of allowable subject matter." In response, Applicants agree with the Examiner's conclusions regarding patentability, without necessarily agreeing with or acquiescing in the Examiner's reasoning. In particular, Applicants believe that the application is allowable because the prior art fails to teach, anticipate, or render obvious the invention as claimed, independent of how the claimed invention is paraphrased.

**VIII. Conclusion**

Applicant believes that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

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The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 08-2025. Should no proper payment be enclosed herewith, as by a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 08-2025. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicant hereby petitions for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 08-2025.

Respectfully submitted,

Date

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